



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 21, 2008

Dianne Byrum, Treasurer
Michigan Democratic State Central Committee
606 Townsend St.
Lansing, MI 48933

Response Due Date:
April 21, 2008

Identification Number: C00031054

Reference: February Monthly Report (1/1/08-1/31/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 items:

1. Schedule A supporting Line 12 discloses transfer(s)-in from the "Democratic National Committee" totaling \$6,200 for "On-line Voter File Access." Schedule B supporting Line 21(b) reflects \$6,200 in payments for "On-Line Voter File Access." Please be advised that under 11 CFR §300.34, a state, district or local party committee must not use any Federal funds transferred to it from a national party committee or any other State, district or local party committee, as the Federal component of an expenditure or disbursement for Federal Election Activity. Furthermore, your committee must itself raise the Federal component of expenditure or disbursement allocated between Federal and Levin funds.

2. Schedule B supporting Line 21(b) of your report discloses \$18,450 in transfers for "Rent" to the "Democratic State Central Committee (Non-Fed)," which appears to be a non-federal account of your committee. In memo text you state that, "the payments for rent are for our nightly bingo games which are required under State law not reimbursement to the non-federal account". Please clarify whether your non-federal account owns the bingo hall.

Please be advised, if an entity other than your non-federal account owns the facility, you should disclose the payment(s) to the actual payee, rather than

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to your non-federal account to be in compliance with the federal regulations. 11 CFR §104.3(b)(3) Further, the non-federal account is prohibited from paying the entire amount of an expense that will totally or in part benefit the federal account or the federal election process. Further, 11 CFR §§106.6 and 106.7 prohibit a committee's federal account from reimbursing or paying its non-federal account for apparent shared expenses.

-Schedule B supporting Line 21(b) of your report discloses a payment(s) for "On-Line Voter File Access" and "Voter File Modeling," which appears to be disclosed on the wrong line of the Detailed Summary Page. Please be advised that Voter Identification, Generic Campaign and Get-out-the-vote activity conducted in connection with an election in which one or more candidates for Federal office appear on the ballot is considered to be Federal Election Activity. 11 CFR §100.24 Please amend your report to properly disclose this activity on Line 30(b) or provide clarification regarding this activity.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,



Nicole Della Rocco
Campaign Finance Analyst
Reports Analysis Division

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